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REMARKS

Claims 1-42 are pending in this application. The specification has been amended to correct the typographical error noted by the Examiner. Claims 1, 11, 12, 15, 25, 26, 31, 35, 37 and 41 have been amended. Claims 34, 36, 39 and 40 have been canceled.

Claims 1-32 and 35-42 were rejected under 35 USC 103(a) as being unpatentable over Carter (U.S. Patent No. 5,787,175) in view of Follendore, III (U.S. Patent No. 6,011,847). Regarding independent Claims 1, 15 and 31, the Examiner states that Carter teaches encrypting the electronic document using a document encryption key; generating a multi-key encryption table for use in a multi-key encryption method, the table comprising at least one multi-key component (citing figure 6, ref. num. 114, 116 and 118 and col. 13, line 18 through col. 14, line 22); associating a user interface device with the encrypted header, the multi-key encryption table and the encrypted electronic document, wherein the user interface comprises unencrypted information for identifying the electronic document and an interactive element for enabling a user to input a user authorization for access to at least a portion of the encrypted electronic document; and combining the user authorization with each of the stored multi-key components in the multi-key encryption table to decrypt the encrypted header (citing figure 9, ref. num. 160 and 162 and col. 16, line 60 through col. 17, line 26).

The Examiner further stated that Carter does not teach generating an encrypted header comprising information pertaining to the electronic document or upon valid decryption of the encrypted header, decrypting the portion of the encrypted electronic document. But that Follendore teaches generating an encrypted header comprising information pertaining to the electronic document (citing figure 2, ref. num. 224 and col. 1, lines 22-25); and upon a valid decryption of the encrypted header, decrypting the portion of the encrypted electronic document (citing figure 2, ref. num 242). The Examiner further stated it would have been obvious to combine generating an encrypted header comprising information pertaining to the electronic document and upon valid decryption of the header, decrypting the encrypted electronic document. Applicant respectfully disagrees.

Claim 1, as amended, claims a method for protecting an electronic document, comprising: encrypting the electronic document using a document encryption key; generating a multi-key

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encryption table for use in a multi-key encryption method, the table comprising at least one multi-key component and a plurality of dummy encryption components, wherein the multi-key encryption table includes no information that may identify a user or the electronic document; generating an encrypted header comprising information pertaining to the electronic document; associating a user interface device with the encrypted header , the multi-key encryption table and the encrypted electronic document, wherein the user interface device comprises unencrypted information for identifying the electronic document and an interactive element for enabling a user to input a user authorization for access to at least a portion of the encrypted electronic document; combining the user authorization with each of the stored multi-key components in the multi-key encryption key table to decrypt the encrypted header; and upon a valid decryption of the encrypted header, decrypting the portion of the encrypted electronic document.

Carter does not teach generating a multi-key encryption table for use in a multi-key encryption method, the table comprising at least one multi-key component and a plurality of dummy encryption components, wherein the multi-key encryption table includes no information that may identify a user or the electronic document, as claimed in part in Claims 1, 15 and 31. Applicant's multi-key encryption table includes no information which may identify the users or the document. At most Carter teaches generating a list of member definitions. Carter's list of member definitions (see Figures 4 and 5 of Carter) includes a member identifier 98, which is not encrypted, and is directly associated with that member's encrypted document key 100.

Carter does not teach combining the user authorization <u>with each of the stored multi-key components in the multi-key encryption table</u> to decrypt the encrypted header, as claimed in part in Claims 1, 15, 31 and 35. Carter teaches associating a member identifier 98 (which is in the clear) with its associated encrypted document key 100. Thus, in Carter, once a member is identified, that member's key can be easily found from the member's profile and decrypted. Since the member identifiers are in the clear, Carter does not need to combine the user authorization with each of the stored multi-key components in the multi-key encryption table to decrypt the encrypted header (or anything else).

Nothing in Follendore III overcomes the lack of teachings of Carter. Follendore III does not teach or suggest generating a multi-key encryption table for use in a multi-key encryption

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method, the table comprising at least one multi-key component and a plurality of dummy encryption components, wherein the multi-key encryption table includes no information that may identify a user or the electronic document. Nor does Follendore III teach or suggest combining the user authorization with each of the stored multi-key components in the multi-key encryption table to decrypt the encrypted header.

Independent Claims 1, 15, 31 and 35 are believed to be allowable. Since Claims 2-14 and 30 depend from Claim 1, Claims 16-29 depend from Claim 15, Claims 32-33 depend from Claim 31, and Claims 37, 38, 41 and 42 depend from Claim 35, they are also believed to be allowable. Claims 1-33 and 35, 37, 38, 41 and 42 are believed to be in condition for allowance.

No additional fee is believed to be required for this amendment; however, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025.

Reconsideration of this application and allowance thereof are earnestly solicited. In the event the Examiner considers a personal contact advantageous to the disposition of this case, the Examiner is requested to call the undersigned Attorney for Applicants, Jeannette Walder.

Respectfully submitted,

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Xerox Corporation
El Segundo, California
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